## UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Twanda Marshinda Brown, et al.,

Plaintiffs,

v.

Lexington County, South Carolina, et al.,

Defendants.

Civil Action No. 3:17-cv-01426-MBS

## DECLARATION OF RECORDS CUSTODIAN REGARDING SUBPOENA TO ROBERT MADSEN, ELEVENTH CIRCUIT PUBLIC DEFENDER

I, Robert Massey, am designated to address the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action ("Subpoena"), and declare as follows:

- A thorough review of all files was made to produce all documents requested in that Subpoena.
- 2. After conducting a complete review of our files, the documents produced represent a complete set of the documents requested. No documents, within the scope of the subpoena, have been destroyed or withheld.
- 3. The records being produced were made and have been kept in the course of the Eleventh Circuit Public Defender's regularly conducted business.
- 4. The records being produced herewith were made at or near the time reflected in them by or from information transmitted by someone with knowledge of the records' content.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing is true to the best of my information and belief.